UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
FELICIA ALTERESCU,	X

Plaintiff,

NOTICE OF MOTION

-against-

Case No. 21-CV-00925-KPF

NEW YORK CITY DEPARTMENT OF EDUCATION; RICHARD CARRANZA, CHANCELLOR; and THE UNITED FEDERATION OF TEACHERS

			Def	enda	nts.
 - — — –	 	 			X

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of the Motion to Dismiss the Complaint as to Defendant United Federation of Teachers ("UFT"), the Declaration of Paul K. Brown, with exhibits annexed thereto, and all prior proceedings had herein, Defendant UFT will move this Court, Honorable Katherine Polk Failla, U.S.D.J., at the United States Courthouse, 40 Foley Square, New York, New York 10007, on a date to be determined by the Court, for an Order, pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing the Complaint as to Defendant UFT with prejudice, and granting such other an further relief as the Court deems just and proper.

Dated: New York, New York October 6, 2021

Respectfully submitted,

ARCHER, BYINGTON, GLENNON & LEVINE, LLP Attorneys for Defendant United Federation of Teachers

By: /s/ Paul K. Brown

Paul K. Brown 1430 Broadway, Suite 1107 New York, NY 10018 (631) 249-6565 pbrown@abgllaw.com

TO: Dwayne Christopher Mason
Attorney for Plaintiff
Mason Law, PLLC
11 Broadway, Ste 615
New York, NY 10004
(212) 498-9691
cmason@masonlawpllc.com

Lawrence John Profeta

Attorney for Defendant Department of Education
New York City Office of Corporation Counsel
100 Church Street, Room 6-210
New York, NY 10007
(212) 788-0954
lprofeta@law.nyc.gov